

# raiser&kenniff

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September 5<sup>th</sup>, 2023

**VIA ECF**

Hon. Magistrate Judge Ona T. Wang  
Daniel Patrick Moynihan United States Courthouse  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Gerard Sillam, et al. v. Labaton Sucharow LLP et al.*  
No. 21 CV 6675 (CM)

Honorable Judge Wang:

I hope this letter finds you well. On behalf of the Plaintiffs in the above-captioned case, we respectfully request a one-week extension for the filing of Plaintiff's Memorandum of Law regarding the issues raised by the Court at the August 15, 2023 Status Conference; the current deadline is September 8, 2023.

At the time of the aforementioned Status Conference, I was in the midst of another civil jury trial. I was expecting the trial to conclude that week, but there were several unanticipated complications which led to its elongation until August 23, 2023. Unfortunately, I fell ill right around this time and was out of the office and relatively unproductive for almost a week and a half, finally recovering over the Labor Day weekend. Although my support staff has been working diligently the entire time in order to meet the deadline, communication with the French attorneys who are assisting us with the crux of this Memorandum has been limited due to August being a "holiday month" in France. We still have outstanding questions that must be addressed in order to present a complete and precise argument regarding relevant French statutes and case law. Given these hurdles, we believe it would be of significant interest to the Court if we are granted an additional week to draft a

honorable Court that an extension would not be unduly burdensome to this proceeding as the Honorable Judge McMahon has issued an Order to stay any and all deadlines until Your Honor's questions are reviewed and settled. We would also, of course, not object to Defendants receiving an extension to their deadline to reply if Your Honor deems it fair and proper.

We thank you for your consideration in this matter. Should you have any comments or questions concerning these requests, please contact us at your convenience.

Respectfully submitted,

*Douglas Reda*

RAISER & KENNIFF, P.C.

Attorney for Plaintiffs

By: Douglas M. Reda